

## Bayside Trucks, Inc. 11 Ledin Drive P.O. Box 25 Avon, MA 02322 Tel: 508-427-6524 Fax: 508-427-6530



October 26, 2011

Mr. H. Curtis Spaulding Regional Administrator Region 1, U.S. Environmental Protection Agency Suite 100 5 Post Office Square Boston, MA 02109-3917

Re:

Request to modify the National Pollution discharge Elimination System (NPDES) Permit for the City of Brockton's Advanced Water Reclamation Facility (BA WRF) in order to support a regional approach to waste water management.

Dear Mr. Spaulding:

Bayside Trucks, Inc. supports regional approaches to waste water management and increased flows through the Brockton facility. We support the opportunities identified in the MDEP studies and agree these opportunities will meet the needs of the upper basin communities.

The Brockton plant was recently upgraded but the 18.5 MOD limit reflects the plant's past capacity, level of treatment, and resulting pollutant loads on the river. However, the recent expansion and upgrading of the facility and the elimination of much inflow and infiltration have reduced flows while increasing the quality of the effluent. This reduces loads on the river to well below applicable standards. Bayside Trucks, Inc. believes this progress should allow the next NPEDS Permit (due in November) to use load limits that are equivalent to discharges of up to 20.5 MOD.

As a company doing business in the Avon Industrial Park, we urge the EPA to acknowledge this upgraded effluent quality by modifying the load limits and thereby increasing the allowed flows under the next NPDES permit to 20.5 MGD. This added capacity will meet short term regional needs as well as allowing vacant, suitably commercial/industrial zoned land in our area to be developed, creating more jobs and adding to the local tax base. Furthermore, it would allow Bayside Trucks, Inc. the opportunity to participate in new development and give us the ability to expand current building with a resultant increase in workforce.

It is important to allow the communities to jointly make best use of this upgraded treatment and added capacity; thereby making efficient use of existing infrastructure and allowing needed economic growth. Therefore, Bayside Trucks, Inc. seeks your consideration of adopting the appropriately revised load limits.

Please feel free to call with any questions.

Sincerely,

Paul Maleiko President

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